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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10 WESTERN DIVISION
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12 VALERIE JACKSON,
Administrator of the Estate
13 of Henry Jackson,

14 Plaintiff,

Civil No.

15 vs.

16 RHINO ENTERTAINMENT
COMPANY; SANCTUARY
17 RECORDS GROUP LIMITED.

COMPLAINT FOR
BREACH OF CONTRACT;
DEMAND FOR JURY TRIAL

18 Defendants.
19 _____/

1 December 29, 2005 onwards.

2 7. Jackson and Henry Jackson have performed all obligations required of them
3 under the Artist Agreement.

4 8. As a direct and proximate result of Rhino's and Sanctuary's actions Jackson
5 has been damaged in a sum in excess of \$75,000.00 as lost contractual royalty income.

6 WHEREFORE, Plaintiff prays judgment against Defendants, jointly and
7 severally as follows:

- 8 1. For damages in excess of \$75,000.00, including prejudgment interest;
- 9 2. For costs of suit;
- 10 3. For such other relief as the Court may deem just;
- 11 4. Plaintiff demands a trial by jury

12 Dated: March 11, 2016

13 Respectfully submitted,

14 /S/

15 STEVEN AMES BROWN,
16 Attorney for Plaintiff
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